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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KIM SMITH, :
Plaintiff, :
: Civil No. 1:01-0817
v. :
: (Judge William W. Caldwell)
JAMES MORGAN, et al., :
: (Magistrate Judge Malachy E. Mannion) ✓
Defendants. :
:

**CORRECTIONS DEFENDANTS”
MOTION FOR SUMMARY JUDGMENT**

The Corrections Defendants, by and through their attorney, John J. Talaber, Assistant Counsel, Pennsylvania Department of Corrections, pursuant to Fed.R.Civ.P. 56, respectfully moves this Honorable Court to grant summary judgment on their behalf for the reasons stated within the supporting brief to be filed in accordance with Pa.MDLR 7.5.

FILED
HARRISBURG, PA

DEC 13 2002

MARY E. D'ANDREA, CLERK
Per _____
Deputy Clerk

WHEREFORE, the Corrections Defendants respectfully move this Honorable Court to grant summary judgment on their behalf.

Respectfully submitted,
Office of General Counsel

BY:


John J. Talaber

Pa. Department of Corrections
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444
Attorney Id. No. 83279

Dated: December 13, 2002

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JAMES MORGAN, et al.,	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I the undersigned hereby certifies that a copy of the Corrections Defendants' Motion for Summary Judgment in this matter was served upon the person(s) in the manner indicated below.

Service by first-class mail
addressed as follows:

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Marilyn Jones
Clerk Typist 2

PA Department of Corrections
55 Utley Drive
Camp Hill, PA 17011
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Dated: December 13, 2002